

Upon confirmation by counsel that all are available for trial on a two-week standby basis, the motion is granted. Trial reassigned for 11/12/12 on a two-week standby basis.

s/ James S. Gwin 9/17/12

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
UNITED STATES DISTRICT JUDGE EASTERN DIVISION

MOONSCOOP SAS,)	CASE 1:09-CV-01885-JG
)	
Plaintiff,)	JUDGE JAMES GWIN
)	
v.)	
)	
AMERICAN GREETINGS)	AGREED MOTION TO CONTINUE
CORPORATION,)	TRIAL DATE BY ONE WEEK
)	
Defendant.)	

Defendant American Greetings respectfully requests the Court to continue the trial date by one-week, from November 5, 2012 until November 12, 2012, due to a conflict in the schedule of an important third-party witness.

After the October 30, 2012 pre-trial, at which the Court set a trial date of November 5, 2012, counsel for defendant communicated with one of its primary witnesses, Mr. Josef Mandelbaum. As the Court will recall, in 2008 and 2009, when the relevant events in this case occurred, Mr. Mandelbaum was the CEO of the Intellectual Property Group at American Greetings Corporation, and was the primary negotiator of the agreements at issue here. Mr. Mandelbaum also executed these agreements on behalf of defendant, and was defendant's primary representative involved in the attempts to close the agreement with the plaintiff, MoonScoop.

In order to move to Israel, Mr. Mandelbaum resigned from defendant's employ in June 2010, and became the CEO of a publicly traded company in Israel. Mr. Mandelbaum currently resides in Tel Aviv, Israel, and has a previously scheduled Board meeting the week of November 5, 2012 in Tel Aviv; however, he is able to travel to Cleveland to testify the week of November 12 or November 19 or November 26, 2012.